

Exhibit 13

From: David Bouchard
Sent time: 04/14/2023 02:56:30 PM
To: Richens, Dana <DRICHENS@sgrlaw.com>; Will Story <WStory@hallboothsmith.com>; D Brown <dbrown@hallboothsmith.com>
Subject: RE: United Inn & Suites Deposition Scheduling -- AG, GW, and JG Matters

Dana, thanks. Are you able to give me some ballpark of the volume to be produced? Fewer than 1,000 documents, more than 1,000 documents, more than 5,000 documents? If you can give some sort of very rough estimate, I would appreciate it, and I could give better assurances to everyone about whether May 2nd is even worth holding.

As you know, Plaintiff JG has repeatedly requested documents that do not require use of search terms. For example only, she has requested on multiple occasions payroll records and training records, among other documents. She first requested such documents 8 months ago. Your client's witnesses testified that such documents exist and are in their possession in hard-copy form. Can you please produce those now? They are very long overdue and there is no reason to hold on producing those until next Friday, when your client's documents hitting on search terms are due to be produced. As you know, I offered next Friday as deadline as a professional courtesy, which you called "generous." I'm unclear why hard-copy documents that exist, that are in your client's possession, and that have been requested have still not been produced. Thank you.

Best regards,

David

David Bouchard ([Bio](#))

Partner



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From: Richens, Dana <DRICHENS@sgrlaw.com>
Sent: Friday, April 14, 2023 7:31 AM
To: David Bouchard <david@finchmccranie.com>; Will Story <WStory@hallboothsmith.com>; D Brown <dbrown@hallboothsmith.com>
Subject: RE: United Inn & Suites Deposition Scheduling -- AG, GW, and JG Matters

David, good morning. Yes, May 2 is the only day that works from among the ones you offered. The witnesses are otherwise occupied with family graduations and other commitments for the other days.

We are midstream on the document review but I can tell you that despite the use of the search terms you proposed (and others that we added) we are not encountering as many responsive documents as I was expecting. I'm not able to give you an exact figure or any estimates beyond that at this time, other than to say I expect it will be a manageable number of documents.

Dana

Dana M. Richens
Partner

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From: David Bouchard <david@finchmccranie.com>
Sent: Thursday, April 13, 2023 5:11 PM
To: Richens, Dana <DRICHENS@sgrlaw.com>; Will Story <WStory@hallboothsmith.com>; D Brown <dbrown@hallboothsmith.com>
Subject: RE: United Inn & Suites Deposition Scheduling -- AG, GW, and JG Matters

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Dana, thanks for getting back to me. I've added Don Brown because Will is leaving Hall Booth, as I'm assuming you know. We need to pick a date that works for all of us, which is why I emailed you and Will below on 3/31. Can you please provide more than one date that works out of the 6 that I offered? If 5/2 is the only date that works, please let me know. Don, please let us know what dates you're available of those I offered below.

Assuming Don is available on 5/2, I'm still not sure whether I'll be prepared to go forward that day. As I said in my 3/31 email, "[t]hat depends in large part on the documents that United Inn produces in the coming days in the AG, GW, and JG matters in response to the plaintiffs' respective requests for production." I am awaiting those documents and have no sense for how many to expect. What's your projection, Dana? That's why I said: "In the coming days, after I see the documents produced by United Inn, we can agree on a specific date or dates for their depositions if I decide it is necessary to re-open and continue the depositions. I do not want to wait until mid or late April to start talking about scheduling depositions in May because the back half of May is very busy for me with a federal trial starting on May 22nd."

Best regards,

David

David Bouchard (Bio)

Partner



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From: Richens, Dana <DRICHENS@sgrlaw.com>
Sent: Thursday, April 13, 2023 4:42 PM
To: David Bouchard <david@finchmccranie.com>; Will Story <WStory@hallboothsmith.com>
Subject: RE: United Inn & Suites Deposition Scheduling -- AG, GW, and JG Matters

David,

Mr. Shareef and Mr. Islam, and I, are all available on May 2. I've asked them to hold that date.

Dana

Dana M. Richens

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From: David Bouchard <david@finchmccranie.com>
Sent: Friday, March 31, 2023 2:50 PM
To: Richens, Dana <DRICHENS@sgrlaw.com>; Will Story <WStory@hallboothsmith.com>
Subject: United Inn & Suites Deposition Scheduling -- AG, GW, and JG Matters

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Good afternoon, Dana and Will—

As I have discussed with both of you, I anticipate that I may need to re-open and continue the depositions of United Inn's 30(b) (6) representative, United Inn's owner (Mr. Shareef), and United Inn's manager (Mr. Islam). That depends in large part on the documents that United Inn produces in the coming days in the AG, GW, and JG matters in response to the plaintiffs' respective requests for production. Can you please confirm that the dates May 2 – 5 and May 9 – 12 work for your schedules and for their schedules? If so, please go ahead and hold those dates for depositions and please ask them to do so as well. In the coming days, after I see the documents produced by United Inn, we can agree on a specific date or dates for their depositions if I decide it is necessary to re-open and continue the depositions. I do not want to wait until mid or late April to start talking about scheduling depositions in May because the back half of May is very busy for me with a federal trial starting on May 22nd.

Best regards,

David

David Bouchard ([Bio](#))

Partner



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